



ANDREW M. BATEMAN
General Counsel for ORS

Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

November 30, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges (*This filing includes a request for an increase to retail electric rates) (See Commission Order No. 2020-313).
Docket No. 2020-125-E

Dear Ms. Boyd:

On Wednesday, November 25, 2020, Dominion Energy South Carolina, Inc. ("DESC") filed its Return to Motion for Partial Summary Judgment Regarding Proposed Amendments to Section V of DESC's General Terms and Conditions. The South Carolina Office of Regulatory Staff ("ORS") has reviewed DESC's Return and continues to assert that DESC's revisions to Section V of its General Terms and Conditions are prohibited as a matter of law and should be rejected. In the alternative, ORS recommends that the Public Service Commission of South Carolina ("Commission") accept DESC's offer to submit a second proposed revision to Section V of the General Terms and Conditions to clarify that DESC will not be insulated from its own negligence. *See* Return, p. 5, n. 2; p. 8. Any such revisions also should address Section V, paragraph B of the General Terms and Conditions, which DESC's Return does not address. In addition, ORS maintains its position that the indemnification language DESC proposes adding to Section V should be removed. Should the Commission accept DESC's offer to submit a second revision to Section V of the General Terms and Conditions, ORS respectfully requests the opportunity to review any revised language DESC proposes to assess whether DESC's revisions resolve the concerns raised in ORS's Motion for Partial Motion for Summary Judgment.

Letter – Jocelyn G. Boyd, Esquire
Page 2 of 2
November 30, 2020

ORS would welcome the opportunity to provide oral argument on these issues should the Commission desire.

Sincerely,



Andrew M. Bateman

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)